

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Janice Biagioli, v. Credit Control, LLC,	Plaintiff Defendant	Docket No. 3:21-CV-2008 (JUDGE ROBERT D. MARIANI)
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**STIPULATION TO EXTEND DEADLINES**

1. Currently, the deadline for discovery in this matter is April 28, 2023.
2. The parties have been engaging in discovery, and are preparing to conduct depositions.
3. However, due to scheduling conflicts involving counsel and the parties, it will not be possible for depositions to be completed by the current discovery deadline.
4. Counsel for the parties have conferred in good-faith, and believe that a 60-day extension of time will be sufficient for depositions to be completed.
5. Additionally, the parties believe that the deadline for dispositive motions should likewise be extended.
6. This request is not being made for any improper purpose, and is instead being made due to *bona fide* scheduling conflicts.
7. Thus, the parties request that the Court approve this stipulation and:
  - a. extend the deadline for depositions to June 30, 2023, and
  - b. extend the deadline for dispositive motions to August 31, 2023.

*s/ Brett Freeman*

Brett Freeman  
Bar Number: PA 308834  
FREEMAN LAW  
210 Montage Mountain Road  
Moosic, PA 18512  
Attorney for Plaintiff

*s/ Brendan Little (with consent)*

Brendan Little  
Bar Number PA 317322  
Lippes Mathias, LLP  
50 Fountain Plaza, Suite 1700  
Buffalo, NY 14202  
Attorney for Defendant

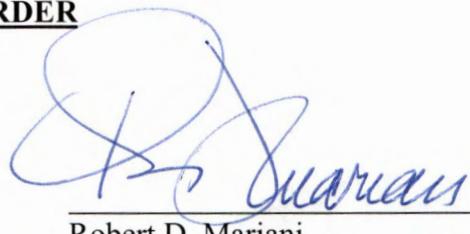
Phone (570) 589-0010  
Fax (570) 456-5955  
Email: [brett@freeman.law](mailto:brett@freeman.law)

Phone (716) 853-5100  
Fax (716) 853-5199  
Email: [blittle@lippes.com](mailto:blittle@lippes.com)

**ORDER**

So ordered.

Date: 4/17/23



Robert D. Mariani  
Robert D. Mariani  
United States District Judge